

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)	
)	
v.)	
)	
BONNIE GARDNER,)	Criminal No. 09-180
)	
Defendant.)	Electronically Filed

UNOPPOSED MOTION TO TRAVEL

AND NOW comes Defendant, Bonnie Gardner, by and through her attorney, Martin A. Dietz, Esquire, and respectfully moves this Court for permission to travel upon the following basis:

1. Defendant, Bonnie Gardner (hereinafter “Ms. Gardner”) pled guilty to one count of conspiracy to commit mail fraud and wire fraud. She is currently free on bond pending sentencing.
2. Ms. Gardner has been fully compliant with the conditions of pretrial release.
3. Ms. Gardner requests that the Court permit her to travel to Ft. Wayne, Indiana to attend the graduation ceremony of a family member between June 28, 2013 and July 1, 2013.
4. Counsel for the United States of America, Assistant United States Attorney Brendan Conway, consents to the granting of the instant motion.

WHEREFORE, Defendant, Bonnie Gardner, respectfully requests that the Court permit her to travel to Ft. Wayne, Indiana between June 28, 2013 and July, 1, 2013.

Respectfully submitted,

s/ Martin A. Dietz.
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